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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

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Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DEBTORS' AND SHAREHOLDER  
PROONENTS' JOINT OPPOSITION TO  
MARY KIM WALLACE'S EMERGENCY  
MOTION FOR ADDITIONAL TIME TO  
EXAMINE AND RESPOND TO FILINGS  
IN THE CHAPTER 11 CASES**

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
2 debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases  
3 (the “**Chapter 11 Cases**”), and the Shareholder Proponents,<sup>1</sup> jointly submit this opposition to the  
4 *Emergency Motion to Allow Pro Per Litigant Mary Wallace Time to Examine Dockets Filed in The*  
5 *PG&E’ Bankruptcy Case [sic] and Allow Time to Respond*, entered on May 29, 2020 [Docket No. 7652].

6 On May 13, 2020, after two hearings and an opportunity for all interested parties to be heard, the  
7 Court entered the *Order Establishing Confirmation Hearing Protocol* that, among other things,  
8 established May 22, 2020 as the date by which proponents and supporters of the Plan were required to  
9 file pleadings in support of confirmation and replies to objections to confirmation, including any  
10 declarations in support of the foregoing. *See* Dkt. No. 7652. On May 13, 2020, the Court also confirmed  
11 that the Confirmation Hearing would begin on May 27, 2020. *See id.*<sup>2</sup> The Court entered this Order  
12 without objection. The time for parties, including Ms. Wallace, to raise scheduling issues has long  
13 passed.

14 There are literally hundreds of parties<sup>3</sup> in interest in these Chapter 11 Cases, not one of whom,  
15 other than Ms. Wallace, has raised an objection to the timing of, or the ability to prepare for or  
16 meaningfully participate in, the ongoing Confirmation Hearing. As the Court is aware and as has been  
17 widely publicized, these Chapter 11 Cases are proceeding at a pace designed to take into account the  
18 critical June 30, 2020 deadline established by Assembly Bill 1054 (“**AB 1054**”). The Court, the Debtors,  
19 and the Debtors’ key stakeholders, including the Fire Victims and their attorneys, have been aware of  
20 and diligently working to meet that deadline ever since the California Legislature enacted AB 1054 on  
21 July 12, 2019, nearly a year ago.

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23 <sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings given to such terms  
24 in the *Plan Proponents’ Joint Memorandum of Law and Omnibus Response in Support of Confirmation*  
25 *Of Debtors’ And Shareholder Proponents’ Joint Chapter 11 Plan Of Reorganization* [Docket No.  
7528].

26 <sup>2</sup> The Court first established May 27, 2020 as the date on which the Confirmation Hearing would begin  
27 back on February 11, 2020. *See* Dkt. No. 5732.

28 <sup>3</sup> *See* Prime Clerk Master Service List as of May 20, 2020 (listing 403 counsel and parties in interest).

1 The active participation of pro per claimants has been amply supported by this Court, and to the  
2 extent that Ms. Wallace has desired to be heard and diligently engage in these proceedings, she has had  
3 that opportunity fully afforded to her. Indeed, Ms. Wallace's objection is focused on very discrete  
4 issues. *See* Dkt. No. 7367. While there has been sufficient time for Ms. Wallace to prepare for any  
5 issue she wished to raise during the Confirmation Hearing, there was certainly enough time for Ms.  
6 Wallace to review the Confirmation Hearing materials with respect to the discrete issues raised in her  
7 objection. Ms. Wallace's untimely emergency motion, filed a day *after* the long-scheduled  
8 Confirmation Hearing had already begun, should thus be denied.

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10 Dated: May 31, 2020  
New York, New York

11 **WEIL, GOTSHAL & MANGES LLP**

12 **KELLER BENVENUTTI KIM LLP**

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14 By: /s/ Stephen Karotkin  
Stephen Karotkin

15 *Attorneys for Debtors and Debtors in Possession*  
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